

# Thomas-Jensen Affirmation

Exhibit # 36

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00039-JJM-PAS

**DECLARATION OF YANG LEE**

I, Yang Lee, declare as follows:

1. I am a resident of the State of California. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. The California Department of Social Services (CDSS) is responsible for the administration of public social services, except health care services and medical assistance, throughout California.

3. I am currently employed by CDSS as Chief Financial Officer and Deputy Director of the Finance and Accounting Division (CFO) and have held this position since March 2022. The Finance and Accounting Division provides fiscal support and oversight through budget development, financial management, accounting, and fund management for CDSS.

4. Prior to my current role, I served as the Assistant Director of Policy and Quality Assurance for the Adult Program Division and Fiscal Affairs for CDSS. Before being employed by CDSS, I was a Principal Program Budget Analyst for the California Department of Finance from 2012 to 2020. For the last 10 years, I have prepared and administered portions of the State's budget, particularly for programs administered by CDSS, including the California Work Opportunity and Responsibility to Kids program (CalWORKs), Child Welfare Services, Child Care and Development, and In-Home Supportive Services.

5. As CFO, I oversee all fiscal operations of CDSS and supervise staff performing administrative and operational functions including budgeting and forecasting, allocating funding to local governments and tribes, budgeting and administering state operations, and accounting for accounts payable.

6. Among the social services programs administered or overseen by CDSS are CalWORKs and federally funded child care programs.

7. CalWORKs is California's version of the federal Temporary Assistance for Needy Families (TANF) program. CalWORKs provides temporary cash assistance for a family's basic needs. It also provides education, employment, training programs, and child care subsidies to assist the family's progress toward self-sufficiency.

8. CalWORKs is overseen by CDSS and is administered by the State's 58 counties. CalWORKs is funded through a combination of federal, State, and County funds. The federal funds are provided to California through the annual TANF block grant. Since 1996, the federal TANF block grant amount to California has been set at approximately \$3.7 billion.

9. Approximately 350,000 families receive CalWORKs benefits each month. For Fiscal Year 2024/25, CalWORKs funding totaled \$7.7 billion which includes \$3.7 billion in federal TANF funding.

10. CalWORKs is a key component of California's safety net for low-income families. Families that qualify for ongoing assistance utilize that funding to pay for housing, food, electricity, and other necessary basic needs. Loss of CalWORKs benefits would increase the risk of low-income families becoming homeless or facing increasing financial pressures including poverty which could increase their risk for involvement with other public social service programs, such as child welfare.

11. CDSS' budget for Fiscal Year 2024/25 has relied on TANF funding for CalWORKs clients based on the anticipated receipt of the \$3.7 Billion in federal TANF funding.

12. CDSS is also charged with the administration of federally-funded child care programs. CDSS' child care programs comprise a high-quality, affordable, early childhood

system of care designed to comprehensively and effectively serve California's children and working families. These programs support the healthy physical, cognitive, social, and emotional growth and development of children, help families achieve personal, social, economic, and emotional stability and enhance parenting skills through participation, and allow families to have maximum choice in planning, implementation, operation, and evaluation of child care programs.

13. CDSS promotes a range of services affording parents the ability to choose the type of care most suited to their needs, including care from licensed child care centers, licensed family child care homes, and license-exempt providers. CDSS' child care and development programs play a vital role in supporting family well-being by facilitating parental employment, training, and education; improving the economic well-being of participating families; and promoting safe high-quality care and learning environments for children when out of their parents' care.

14. CDSS utilizes a combination of federal funding, State funding and other sources funding to provide child care and development services to approximately 228,000 children each month. The Child Care and Development Block Grant Act (42 U.S.C. 9857 et seq.), together with section 418 of the Social Security Act, authorize the Child Care and Development Fund (CCDF) as the primary federal funding source devoted to supporting families with low incomes afford child care and increasing the quality of child care for all children.

15. During Fiscal Year 2024/25, child care and development programs administered by CDSS totaled \$6.5 billion total funds, including \$1.8 billion in Federal Funds. In addition to the Social Services Block Grant (Title XX) and TANF, federal funding is provided primarily from the CCDF. In Fiscal Year 2024/25, child care and development programs administered by CDSS will utilize approximately \$1.1 billion in CCDF dollars, \$171 million in Title XX funding,

and \$308 million in TANF funding. CDSS is scheduled to receive two additional quarterly drawdowns of this funding in April and July of this year.

16. On January 27, 2025, acting director of Office of Management and Budget Matthew J. Vaeth issued M-25-13, issued a “Memorandum for the Heads of Executive Departments and Agencies” regarding “Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs” (“OMB Memorandum”). The OMB Memorandum directed all federal agencies to “pause all activities related to obligation or disbursement of all Federal financial assistance . . . including, but not limited to, financial assistance for foreign aid, nongovernmental organizations, DEI, woke gender ideology, and the green new deal,” which I understand would include disbursements to CDSS and the programs we oversee under our current federal funding sources, described above.

17. Any pause in our federal funding would have crippling effects on the administration of these programs. For example, TANF funding is dispersed quarterly and CDSS anticipates drawing down its next \$939,000,000 disbursement in April 2025, followed by another disbursement of the same amount in July 2025. Any pause in these disbursements would result in the State’s inability to fund all of CalWORKs’ payments, subsidies, vouchers, housing assistance, and other services to CalWORKs clients (clients). This would not only devastate clients, who will have less cash available to pay rent, buy food, and support their families, but also impact service providers that serve clients who utilize CalWORKs for services including mental health and substance abuse, domestic violence, education and workforce support, child care, and housing and homelessness intervention.

18. In April 2025, CDSS is scheduled to receive disbursements of \$288,637,000 between the three different child care funding sources. Any pause in these disbursements would

result in the State being forced to operate as the sole source of funding for child care and development programs through April 2025. Afterwards, the State would be unable to support families in need of child care.

19. Any pause in CDSS' federal funding would also force parents who use CDSS childcare providers to cut back on work if they are unable to find alternative care, which would harm not only the parent and child, but also State and federal revenues. Child care, and investments in child care and early childhood education, yield enormous returns to society. Every \$1 invested in high-quality child care yields \$7 to \$12 in social returns, including long term impacts on educational attainment, employment, and earnings both for the children who attend and participating families. Child care is also key to increasing labor force participation, employment, and earnings among parents; during the pandemic, investments in child care led to a 2-3 percentage point increase in the labor force participation rate among mothers of young children -- roughly 325,000 more women were working each year over two years.

20. Child care providers may also no longer be able to maintain a sustainable business model due to the already slim margins associated with operating a child care center. Losing even a small portion of clients could cause a cascading impact throughout the child care system, resulting in closures of child care facilities across the State – further impacting families, child care providers who are now out of jobs, and additional impacts to State and federal tax revenues.

21. If the federal funding is again paused, blocked, denied or delayed suddenly, we are concerned that we will not be able to meet the needs of families who rely on these programs and that the impacts on their well-being and economic stability will be significant.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on February 5, 2025, at Sacramento, California.

  
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Yang Lee